

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**

NO. DF-24-18010

**IN THE MATTER OF
THE MARRIAGE OF**

**GWENDOLYN ULIJASZ-MCKEMIE
AND
JASON MCKEMIE**

§
§
§
§
§
§

IN THE DISTRICT COURT

254TH JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

FILED
2024 DEC 31 PM 1:23
FELICIA PITRE
DISTRICT CLERK
DALLAS CO., TEXAS
Dakota Bradford DEPUTY

**MOTION TO MODIFY AND EXTEND TEMPORARY EX PARTE PROTECTIVE
ORDERS**

This Motion to Modify and Extend Temporary Ex Parte Protective Order is brought by Applicant Gwendolyn Uljasz-McKemie, who shows in support:

On December 18, 2024, a Temporary Ex Parte Protective Order was issued, and a hearing was set for December 31, 2024, at 1:30 p.m., to be heard in conjunction with the Ex Parte Temporary Restraining Order issued on December 18, 2024, regarding the parties, in Cause No. DF-24-18010.

Due to an inability to obtain the evidence and witnesses required, within the fourteen-day period, the temporary orders hearing on this matter needs to be reset. Petitioner is still in the process of attempting to recover multiple files and evidence deleted from her computer and iCloud, as well as removing the malware that was used on her devices.

Good cause exists for extension of the Temporary Ex Parte Protective Order because the temporary restraining order will expire on December 31, 2024, before a hearing can be held in this matter and before Petitioner will be able to access the documents required for the hearing.

In addition, Petitioner has relocated since the issuance of the original Ex Parte Temporary Restraining Order and requests that the Court modify the temporary restraining order to apply to her new residence.

Gwendolyn Uljasz-McKemie prays that the Court grant this Motion to Modify and Extend Temporary Ex Parte Protective Order.

Respectfully submitted,

HARGRAVE FAMILY LAW

4201 Spring Valley Road, Suite 1210

Dallas, Texas 75244

Tel: (214) 420-0100

Fax: (214) 420-0101

By: 

DONNA R. TOMLINSON

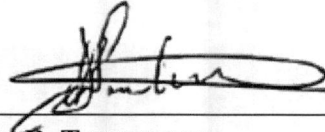
State Bar No. 24046868

donna@jhfamilylaw.com

Attorney for Gwendolyn Ulijasz-McKemie

Certificate of Conference

This is to certify that a reasonable effort has been made to resolve the issues contained herein and prior to the filing of this Motion. No agreement has been reached; therefore, a hearing will be necessary.

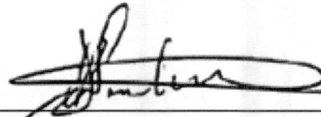


DONNA R. TOMLINSON
Attorney for Petitioner

Certificate of Service

I certify that a true copy of this *Motion to Modify and Extend Temporary Ex Parte Protective Order* was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on December 31, 2024:

Brandt Webb.



DONNA R. TOMLINSON
Attorney for Petitioner